



August 15, 2019

Regional Freedom of Information Officer
U.S. EPA, Region 1 (OARM01-6)
5 Post Office Square, Suite 100
Boston, MA 02109-3912
(617) 918-1102

Re: Freedom of Information Act Request

Dear Sir or Madam:

Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. 552 and 42 U.S.C. Section 9604(e)(7)(A),¹ I am requesting copies and/or access to records held at EPA's Region 1 office.

Records of interest include documents created, compiled, and submitted to the EPA under regulatory programs such as the Resource Conservation and Recovery Act (RCRA), the Toxic Substances Control Act (TSCA), Clean Air Act (CAA), the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), and the Emergency Planning and Community Right-to-Know Act (EPCRA).

Specifically, I am requesting release of a number of specific documents and types of documents held at Region 1 concerning the operations of American Hoechst Corporation in Coventry, Rhode Island. Below, I have included information on the site occupant's name, address(es), any available facility ID numbers, and the types of documents requested. The following sections are arranged according to specific EPA regulatory programs.

At various times the company at this site has used names including, but possibly not limited to, the following:

- CNA Holdings LLC
- American Hoechst Corporation
- Hoechst Chemical Corporation
- Metro Dyestuffs

¹ The relevant statutory text provides that: "Any records, reports, or information obtained from any person under this section (including records, reports, or information obtained by representatives of the President) shall be available to the public, [except for trade secrecy claims]. Trade secrecy claims are restricted by section 104(e)(7)(F).

Additionally, though most documents place the site in Coventry, Rhode Island, some documents may list it in West Warwick, Rhode Island.

AIR Requested Documents

We understand that American Hoechst Corporation at 129 Quidnick Street, Coventry, RI, operated under the regulation of the Clean Air Act. We therefore request the following documents related to this facility:

- Air permit registration and application documents
- Inspection files
- Correspondence for 1976 and earlier

RCRA Requested Documents

We understand that hazardous waste generated by American Hoechst Corporation, Hoechst Celanese Corp, and Rhodes Technologies at 129 Quidnick Street and 500 Washington Street, Coventry, RI, was regulated under the Resource Conservation and Recovery Act (RCRA) and was assigned the following RCRA facility ID: RID001805670.

We request the following materials relating to this facility produced by the company as required by RCRA:

- RCRA Notification
- Part A application (Form 8700-12)
- Related correspondence for the period 1984 and earlier
- Work plans and closure documentation related to contamination processes and chemical releases
- Biennial hazardous waste reports from 1981 to 1985

SSTS Requested Documents

As required under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Section 7, information on pesticide establishments is tracked through the Section Seven Tracking System (SSTS). We understand that Clariant Corp at 129 Quidnick Street registered with the company number 008340RI001.

We therefore request submittal application documentation provided by the above company.

TSCA Inventory Requested Documents

We understand that, under the chemical inventory provisions of the Toxic Substances Control Act (TSCA), Hoechst Celanese and American Hoechst at 500 Washington Street, Coventry, RI identified certain chemicals used at this site. We therefore request the following documents related to these facilities produced as required by TSCA:

- 1986 Reporting Year Data
- 1990 Reporting Year Data

TSCA PCB Regulations

We understand that, under the PCB regulations adopted pursuant to section 6 of the Toxic Substances Control Act, that PCB waste materials may have been used or remediated at American Hoechst Corporation, Rhodes Technologies, Dystar, and Clariant at 129 Quidnick Street, 500 Washington Street, and 502 Washington Street, Coventry, RI.

We therefore request the following documents related to PCBs and these installations:

- Documentation of any PCB related notifications, inspections, and enforcement actions involving these locations or parties.
- Documentation of any PCB related notifications, inspections, and enforcement actions involving Docket #01-2007-7003

We also request documentation regarding the following known PCB activity at 500 Washington Street and 500B Washington Street, Coventry, RI:

Waste Manifests (500B Washington)

- 1997 – 356 kgs of PCBs (F004)
- 1997 – 65 lbs of PCBs (MA01)
- 1996 – 327 lbs of PCBs (R007)
- 1996 – 654 lbs of PCBs (MA01/R007)
- 1996 – 45 kgs of PCBs (R001)
- 1994 – 256 kgs of PCBs (MA02/R007)
- 1993 – 1,651 kgs of PCBs (MA02/R005)
- 1993 – 309 kgs of PCBs (MA02/R007)
- 1993 – 398 kgs of PCBs (MA02)
- 1992 – 334 kgs of PCBs (R005)
- 1992 – 2 lbs of PCBs
- 1991 – 12 gallons of PCBs (R005)
- 1991 – 885 gallons of PCBs (R005)
- 1990 – 15 kgs of PCBs (MA02)
- 1990 – 3,997 lbs of PCBs (MA02)

Waste Manifests (500 Washington)

- 2011 – 30 lbs of PCB ballasts (R007)
- 2006 – 14,700 lbs of Waste combustible liquid/Ortho Dichlorobenzene (F002/MA02/R007)
- 2006 – 8,372 kgs of Combustible liquid (F002/MA02/R007)
- 2004 – 154 kgs of Environmental hazardous substances, liquid (MA02)
- 2004 – 4,304 kgs of Environmental hazardous substances, liquid (CR01/MA02)
- 2004 – 3 kgs of Waste toxic solids, Organic (D027/MA02)

- 2003 – 100 kgs of PCBs (MA02)
- 2001 – 80 kgs of PCBs (MA02)
- 1999 – 10 kgs of PCBs (MA02/PCB1)

Other Activities

- 2002-2003 inadvertent PCB manufacturing
- 67 batches of Red Pigment

TRI Requested Documents

We understand that Dystar LP at 502 Washington Street, Coventry, RI was required to file an annual report with the EPA's Toxics Release Inventory (TRI) Program to document the release of certain chemicals. The company was assigned the following TRI facility ID: 02816HCHST500WA. We therefore request the annual report / submittal (also known as "Form R") filed by company for the 1987 reporting year.

We understand that Clariant Corp at 500 Washington Street, Coventry, RI was required to file an annual report with the EPA's Toxics Release Inventory (TRI) Program to document the release of certain chemicals. The company was assigned the following TRI facility ID: 02816CLRNT500WA. We therefore request the annual/submittal (also known as "Form R") filed by company for the 2000 to 2008 reporting years.

Request Information

History Associates requests the release of the above materials. If this is not possible, we request information as to why, as we understand that these collections are publically accessible under statutory regulations.

History Associates agrees to pay all reasonable and standard processing fees authorized by 5 U.S.C. 552(a)(4)(A) and the applicable regulations up to \$250. Should the fees exceed this amount, please call me with an estimate of the total costs in order that specific expenditures beyond \$250 can be authorized.

Should you have any questions or concerns regarding this request, please contact me at (301) 279-9697 or via email at HBergen@historyassociates.com.

Sincerely,

Hilary Bergen